

August 29, 2025

WRA Comments to WREGIS

Western Resource Advocates (WRA) is a 501(c)(3) non-profit that works to promote a decarbonized Interior West that sustains grid reliability and mitigates climate change. WRA is a Class 4 Member of the Western Electricity Coordinating Council (WECC). WRA appreciates WECC's solicitation of stakeholder feedback and provides the following comments addressing (1) the recommended corporate structure and governance for the Western Renewable Energy Generation Information System (WREGIS) and (2) the future of WREGIS software. As WREGIS becomes a separate entity focused on software development, there is an opportunity to enhance the functionality of renewable energy tracking in the West.

PART ONE: RECOMMENDED CORPORATE STRUCTURE AND GOVERNANCE FOR WREGIS

WRA supports WREGIS pursuing 501(c)(4) nonprofit designation so that WREGIS can be mission-driven and further the good of the entire community, as opposed to focusing on furthering the financial interests of members. A 501(c)(4) structure is the best of the available options and there is precedent in entities like WECC and the Midwest Renewable Energy Tracking System (M-RETS) operating as 501(c)(4) nonprofits.

WRA supports pursuing a hybrid board structure with independent and stakeholder members to represent a diversity of views. WRA recommends ongoing stakeholder engagement regarding the development of Board bylaws and procedures. This includes further clarification of the Board selection process and requirements, including details regarding financial independence from WREGIS entities. Stakeholder development of guiding principles for WREGIS governance may aid in this process.

The following recommendations, which reflect broader good governance principles, are provided as a starting point. First, Board meetings should be open to the public whenever possible, with sparing use of and clear guidelines for executive sessions. Second, meeting agendas and summaries should be public. Third, all voting should be on the record. Fourth, Board of Directors search criteria should include diversity of qualifications, geographic locations, and identities. Experience with emerging technologies and in the public interest sector should be valued professional qualifications. Diverse perspectives should also be included in the Board selection process, such as through a nominating committee with diverse stakeholder representation, including expertise in clean energy accounting.

WRA strongly supports the establishment of a stakeholder advisory group to advise the Board and provide transparency in decision-making. Diverse perspectives should be part

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of all stakeholder processes, including a significant role for state regulators and public interest organizations. There should be no unreasonable dues or attendance policies established for the stakeholder advisory group that would prohibit participation of stakeholder entities with limited resources. To support meaningful stakeholder engagement, WREGIS should establish a well-organized and easy-to-use website to share meeting materials in a timely manner.

WRA looks forward to the future home for WREGIS. To avoid repeating past challenges, WRA suggests, where possible, sharing further insights from the process of the WECC consultant in determining “what is best for WREGIS and its many stakeholders.”

PART TWO: THE FUTURE OF WREGIS SOFTWARE

WRA recognizes the challenge of developing a new software system that meets user needs while simultaneously establishing a new entity. Maintaining and improving the renewable energy certificate (REC) tracking system for the Western Interconnection is essential to addressing the current and future needs of U.S. states, Canadian provinces, and voluntary programs. This is particularly critical as the region anticipates a substantial increase in transactions through wholesale electricity markets.

WRA urges WREGIS to adopt a forward-looking approach. The new software vendor will be the third to provide WREGIS’s services since 2022. Delivering a Minimum Viable Product (MVP) by the end of 2027 is a crucial first step. This MVP must be designed to scale efficiently and accommodate the diverse needs of WREGIS’s users. The development process must prioritize ongoing user feedback to ensure the system meets user expectations.

In selecting a vendor and developing the MVP, WRA recommends that WREGIS carefully consider both current and future needs for REC tracking enhancements. These enhancements should include: (1) increased granularity in tracking capabilities; and (2) Application Programming Interface (API) integration to facilitate more efficient data exchange and improve data accuracy. The July user survey indicated that the areas of highest current dissatisfaction, which include essential functions, are: (1) creating and updating Distributed Generation Group (DGG) registrations; (2) initiating retirement or reserve transactions; (3) inputting meter/fuel allocations; (4) matching e-Tags; (5) report downloads; and (6) viewing e-Tags.

Additionally, WRA encourages WREGIS to evaluate the potential for the new software to expand into broader functionalities, such as all-generation certificate tracking with emissions data. As state and regional needs evolve, WRA anticipates that a system capable of aligning RECs with greenhouse gas (GHG) allocations will become increasingly important, especially as wholesale electricity market transactions continue to grow. WREGIS, state regulators – potentially through forums such as the Western Interstate Energy Board (WIEB), and stakeholders should collaborate to anticipate and discuss future system requirements.

WRA appreciates the ongoing efforts of WECC, WREGIS, and CleanCounts/M-RETS staff to maintain and improve WREGIS’s services. Open and effective communication between these entities, users, and other stakeholders will be critical to the success of this transition. To avoid repeating past challenges, WRA suggests a review of the factors that prevented agreement in earlier phases to improve processes for future collaboration.